REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested. Claims 1 to 9, 14 to 22, 25 to 34, 39 to 47 and 50-55, are in the case.

Status

In the Office Action of May 12th, 2008 claims 1-54 were rejected under paragraph two of 35 U.S.C. 112 for being indefinite.

Claims 1-54 were further rejected under 35 U.S.C. 103(a) for being obvious in light of US Patent Publication 2004/0117451 A1 (Chung) in view of a further publication "Mailcat: An Intelligent Assistant for Organizing E-mail" (Segal).

Claim Amendment

In response to the Examiner's various objections and rejections, independent claims 1, 29 and 54 have been amended to more clearly define the invention and to more clearly distinguish it over the art cited. Claims 22 and 47 have been similarly amended and are now presented as independent claims. Furthermore, new independent claim 55 has been added to the application.

Claims 10 to 13, 23, 24, 35 to 38, 48 and 49 have been cancelled.

In response to the Examiner's indefiniteness arguments the independent claims (now claims 1, 22, 29, 47, 54 and 55) have been revised so as to more clearly define the meanings of "comparison criterion" and "pre-selection criterion".

In response to the Examiner's obviousness arguments the features of former claims 10 to 13 have been incorporated into claim 1. Likewise the limitations of

former claims 35-38 have been incorporated into claim 29. Analogous amendments have been made to claims 22, 47, 54 and 55.

Amendments to specification

Paragraphs 7, 9 and 11 have been amended as shown to conform to amended claims 1, 22, 29, 47, 54 and 55 respectively. Support for these amendments can be found in former claims 10-13 and paragraphs 27 and 28. Paragraph 11 has also been replaced with multiple paragraphs in accordance with 37 CFR 1.121(b). The amendments shown in paragraphs 11.1, 11.2 and 11.3 conform to amended claims 22, 47 and 55 respectively. These amendments are supported by former dependant claims 22 and 47 as well as by paragraphs 44, 45 and 46 of the specification.

35 U.S.C. 112 – Indefiniteness

In response to the Examiner's rejection of the term "comparison criterion" as unclear, independent claims 1, 22, 29, 47, 54 and 55 have all been amended to specify that the "comparison criterion" is derived from the current message to distinguish the current message. It is respectfully submitted that, based on this amendment, and also in light of the specification (see paragraphs 21, 23 and 32 of the specification, for example), and some of the dependent claims (see claims 6, 17, 18 and 19, for example) that one of ordinary skill in art would understand what this term encompasses.

The Examiner also objected to the term "selection criterion" as being vague and unclear. In response, all of the independent claims have been amended to more clearly define this term. It is respectfully submitted that based on this amendment, as well as the teachings of the specification (see paragraph 28, for

example) that this term will be clearly understood by one of ordinary skill in the art.

35 U.S.C. 103(a) – Obviousness

Claim 1 has been amended to include the limitations of former claims 10-13. It is respectfully submitted that claim 1 as amended clears the art cited.

As amended claim 1 covers a system comprising "a cache-updating means for updating a folder pre-selection cache based on up to n previous messages undergoing folder selection prior to the current message". The claim further specifies that this cache includes configurable entries for each message in the up to n messages. The cache-updating means operates by updating each of these configurable entries based on the content of the corresponding message and the folder to which this message was allocated. It is respectfully submitted that Chung and Segal disclose neither a folder pre-selection cache comprising up to n configurable entries nor a cache-updating means for updating said cache.

Segal discloses a method whereby a mathematical text classification system is generated and revised based on previously-filed messages. Segal thereby learns and adjusts its model based on the entirety of a user's previously filed messages. However, Segal does not utilize a cache of n configurable entries and its classification system does not maintain a cache or correspond directly with specific messages dealt with by the user – rather it utilizes a prediction model based on all previous inputs. The applicants' invention as claimed configures each of the n entries based on both the content of a message and the folder to which the message is allocated. Chung arguably discloses a filtering system based on n configurable entries but these are static and pre-determined. Segal is capable of learning from a user's previous filing choices but uses a text weight classifier, not a cache, to do so. It is therefore respectfully submitted that the novel structure of updating a limited cache of n configurable entries based on

28

the content of a message and the folder to which the message is allocated by a user is unobvious in light of the methods disclosed in the cited references. Advantages of the invention are described below with reference to additional claims in the specification.

Claim 14 specifies that when a message is moved from a first folder to a second folder the cache-updating means is operable to update the associated folder identification for the corresponding cache entry. Specifically, the cache entry will be modified to point to the second folder rather than the first. In the system taught by Segal the movement, reassignment and deletions of messages from folders is used to maintain and develop a text weighing model. Under such a model the reversal or movement of messages from one folder to another represents only a factor in the larger model. In contrast, the embodiment covered by claim 14 of the present invention is capable of completely updating the cache entry for a particular message. In this manner not only is the new allocation stored but the old allocation will no longer affect future predictions as the entry is updated by overwriting the old allocation.

Claim 15 describes how the folder pre-selection cache is updated without using up ever increasing amounts of storage space or resources. Specifically, the claim specifies that entries in the folder pre-selection cache are updated by discarding an existing entry to provide space for the new entry. Chung bases its model on a set of static filters and Segal updates a mathematical model. Neither therefore disclose a cache maintenance system as claimed. Such a cache maintenance system has the advantage of providing a reasonable compromise between having a folder pre-selection cache which is not so large as to be unwieldy, while at the same time making sure that the limited number of prior decisions used to configure the cache is continuously and easily updated thereby reflecting changes in users' practices. Furthermore, such a model avoids the resource burden imposed by Segal in which the updating of its mathematical model appears to require computational time that increases with the size of the

message. The cache updating model as described in the present invention need not deal with each word in any such manner thereby comparatively reducing the imposed computational loads.

Claim 16 elaborates on claim 15 by specifying that the existing entry having the oldest time and date stamp is discarded to provide storage room for the newest entry. In this manner the system responds temporally to drift in the user's preferences and message management. Segal does not appear to disclose this feature.

If the Examiner elects to maintain the rejection of claim 1, then clarification is respectfully requested. Specifically, the Examiner is respectfully requested to identify what elements in Chung or Segal correspond to the pre-selection cache including a corresponding configurable entry for each message in the up to n messages. Further, the Examiner is respectfully requested to identify the exact element of either of the references cited that correspond to how each entry in the folder pre-selection cash is updated according to the final clause of claim 1. Finally, if the Examiner elects to maintain the rejection of claims 13 to 16, then the Examiner is respectfully requested to identify the specific elements of the references cited corresponding to the limitations of these claims.

Claims 22, 47

Dependent claims 22 and 47 are now presented as independent claims. Support for these amendments can be found, for example, in former dependant claims 22 and 47 as well as in paragraphs 44, 45, and 46 of the specification. It is respectfully submitted that these claims and the dependent claims that depend from them clear the cited references for the same reasons that claim 1 as amended clears the cited art. In addition, these claims as amended define how an attachment associated with an email can be directed to a user selected file folder. Chung discloses that an email may include attachments but does not

30

appear to describe anyway of separately managing the storage and filing of emails and attachments. Furthermore, the Applicant has reviewed Segal and finds no support for the Examiner's assertion that this reference discloses a system for the organization of email attachments. In fact, given that the computational processing time in Segal increases with the size of a message adding an analysis of email attachments to the system has the potential to significantly impact performance. If the Examiner elects to maintain the rejection of claims 22 and 47, or of any dependent claims that depend from them, then clarification is respectfully requested. Specifically, the Examiner is respectfully requested to identify where exactly the cited references disclose each of the features of these claims.

Claims 29, 54 and 55

It is respectfully submitted that claims 29, 54 and the newly presented claim 55 clear the references cited for the same reasons that claim 1 as amended clears the references cited. Further, it is respectfully submitted that many of the dependent claims depending from claim 29 also clear the art cited for reasons analogous to those outlined above in connection with the dependent claims depending from claim 1. Again, if the Examiner elects to maintain the rejection of claims 29, 54 or 55 then clarification is respectfully requested.

Additional Fees

In accordance with 37 CFR 1.16(h) the Applicant hereby submits $630.00. This additional fee represents $210.00 for each of the additional independent claims in the present application in excess of three (fee code 1201/2201). It is believed that there are no additional fees required at this time, however, if additional fees are required please charge the fees to our Deposit Account No. 02-2095

In view of the foregoing, reconsideration and allowance of the application is respectfully requested.

Respectfully submitted,

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Encl.